

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
(HARRISONBURG DIVISION)**

**FREEDOM WATCH, INC.**

**Plaintiff,**

**Case No.: 17-cv-00104-EKD**

**v.**

**RESPONSE UNLIMITED, INC., PHILLIP  
ZODHIATES, AND JOEL BAUGHER,**

**Defendants.**

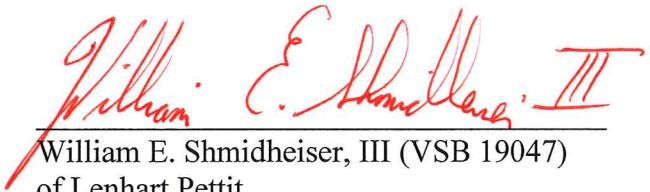
**MOTION TO DISQUALIFY LARRY KLAYMAN AS PLAINTIFF'S COUNSEL**

COME NOW Defendants Response Unlimited, Inc., Phillip Zodhiates, and Joel Baugher, by counsel, and move the Court to disqualify Larry Klayman as Plaintiff's counsel for the reasons set forth in the accompanying Brief In Support Of Motion To Disqualify Larry Klayman as Plaintiff's counsel.

Respectfully submitted this 8th day of January, 2018.

RESPONSE UNLIMITED, INC., PHILLIP  
ZODHIATES and JOEL BAUGHER  
By Counsel

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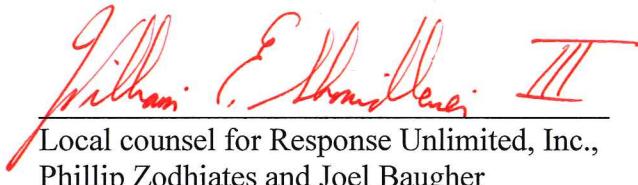
[wes@lplaw.com](mailto:wes@lplaw.com)

*Local counsel for Response Unlimited, Inc.,*

*Phillip Zodhiates and Joel Baugher*

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this 8th day of January, 2018, via the electronic notices generated by the CM/ECF system upon counsel for Plaintiff, Jonathan Alden Moseley, Esq. Moseley Legal Associations, LP, [contact@jonmoseley.com](mailto:contact@jonmoseley.com), and Larry Elliot Klayman, Esq., Klayman Law Firm, [leklayman@yahoo.com](mailto:leklayman@yahoo.com).



Local counsel for Response Unlimited, Inc.,  
Phillip Zodhiates and Joel Baugher

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